

Exhibit 1

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

BLACK EMERGENCY RESPONSE TEAM,
et al.,

Plaintiffs,

v.

Civil Action No.: 21-CV-1022-G

JOHN O'CONNOR, in his official capacity as
Oklahoma Attorney General, et al.,

Defendants.

Second Declaration of the Black Emergency Response Team

I, Jamelia Reed, pursuant to 28 U.S.C. § 1746, declare the following:

1. The facts set forth in this declaration are based on my personal knowledge, and if called as a witness, I could and would competently testify to the following matters under oath.
2. I am a Black woman and Co-founder and Advisor of the Black Emergency Response Team ("BERT"). I plan to graduate from the University of Oklahoma ("OU") with an African and African American Studies major in 2022.
3. BERT was founded in January of 2019 in response to members of the University of Oklahoma Chapter of the Delta Delta Delta (Tri Delt) sorority posting a video to social media in blackface. I, alongside Black student leaders from associations across campus, including historically Black sororities and fraternities, the Black Student Association, and the National Society of Black Engineers, hosted a town hall in response to the incident. As a community, students decided to respond with a peaceful protest. The organizers of the protest became the first officers of BERT.
4. The protest occurred the week after the video of students in blackface. Students of all backgrounds and from all enclaves of campus, including members of the OU football team, gathered at Dale Hall on the southside of campus to form the largest protest on the University's campus in recent memory. We marched to Evans Hall, the administrative building in the center of campus, where we asked for policy

changes to ensure the safety of all students on campus. From Evans, we marched to the Student Union and just outside the Meacham Auditorium.

5. In the spring of 2020, the University of Oklahoma faced additional racist incidents. In the same week, two professors used the n-word in class. BERT hosted a townhall for all students to discuss how to address these racist incidents. BERT then created a list of demands and planned a hunger strike and sit-in of Evans Hall. The demands included the creation of a Center for Research on Race and Ethnicity, the creation of a student advisory council to the Provost's Office, an increase in Black faculty and staff at OU, and a mandatory Diversity, Education, and Inclusion (DEI) course for all incoming freshman and transfer students. Students from all walks of life filled Evans Hall, asking for the OU's accountability and fighting for the right to belong on campus.
6. We sat and slept on the floors of the administration building, eating nothing and drinking water and Gatorade, for days. Press filled the building during the day, and the building was emptied except for students after 5:00 pm. The Governor of Oklahoma threatened to send in state troopers to clear us out. And BERT met regularly with various members of the administration to discuss their demands. The sit-in lasted for three days.
7. On the third day, BERT decided to end the sit-in because the University agreed to create and require a DEI course.
8. For weeks after, many of the participants, myself included, were unable to eat enough food after starving themselves for several days. I still have nightmares around the time of the sit-in each year. I have also been diagnosed with stress and trauma induced health issues stemming from the physical and emotional stress of starvation, death threats, sleep deprivation, and the high stakes of the sit-in. BERT's win with the DEI course was hard-fought.
9. The creation of the DEI course, Gateway to Belonging, was a significant step by the University to prevent racist incidents and to begin creating an inclusive learning environment. It was a showing of good faith to BERT and the Black, Indigenous, and People of Color ("BIPOC") community at OU. Before the creation of the DEI course, incoming freshman were required to take a four-hour diversity training and one-hour sexual assault training as part of their orientation. While the training presented helpful information, students cannot unlearn racism, understand other perspectives, and comprehend the role of systemic racism and sexism in our unequal society in a few hours. The course, by contrast, would be a

semester-long, interactive learning process with texts and discussion. Students would engage with the material and develop critical thinking skills rather than passively sit through the material like they could in a training. Based on my own experience as a student, I think students are far more likely to develop understanding and empathy in a course. The DEI course would make OU a significantly safer place for Black students and students of color. I have attended classes for my major that expose students to non-western perspectives and have observed how the presentation of differing perspectives makes students more empathetic and more aware of the experiences of others. I have observed how these sustained conversations about race and sex promote breaking down stereotypes and enhance understanding across difference.

10. H.B. 1775 drastically undercuts all our progress, by making it significantly more difficult to hold OU accountable and by reversing our most significant point of progress. After H.B. 1775, OU made the DEI course, Gateway to Belonging, voluntary rather than mandatory. Based on my personal observations and conversations with peers, including my role through BERT, H.B. 1775 has made OU's campus more hostile for me, BERT members, other Black students, BIPOC students, and students of all gender identities. For example, during the fall semester of 2021 after H.B 1775 went into effect, hostile groups, including the Proud Boys, brought speakers to campus. While they were set up in the student union, I and other members of marginalized communities were shuffled into a small room in the union while the Proud Boys were escorted out for our safety. It enables a campus full of college students without basic cultural competence and empathy. Because of H.B. 1775, OU is severely undermined in its efforts to prevent racial attacks of students.
11. H.B. 1775 also harms the quality of education to which I and our members have access. I am concerned that professors will be unable or unwilling to teach Critical Race Theory under H.B. 1775. However, Critical Race Theory provides a foundational lens for African American and many other non-western ethnic studies. I understand that professors will be stymied in their efforts to teach African American Studies without Critical Race Theory and without presenting other perspectives. I think education is more valuable when it involves some intellectual discomfort because change and growth happen through discomfort. Even with an approaching graduation date, I am considering transferring because the value of my degree will substantially decline if I cannot be exposed to the principles of Critical Race Theory and other topics related to racism and sexism. I am also concerned about quality professors leaving OU because they fear professional consequences under H.B. 1775 for engaging in necessary discussions

about race and gender. I am being denied the education for which I signed up. H.B. 1775 is a direct attack on the integrity of the university and providing students a space where there are robust discussions and a free exchange of ideas.

I certify under penalty of perjury that the foregoing is true and correct based upon my personal knowledge. Executed in Oklahoma this 12 day of January 2022.


Jamelia R. Reed (Jan 13, 2022 00:27 CST)

Jamelia Reed